

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE	: CHAPTER 13
DALE R. PACKARD	:
	: Case No. 1:20-02533
	:
	:

**MOTION TO AUTHORIZE WAGE ATTACHMENT**

AND NOW, this 8th day of January, 2021, comes the debtor, Dale R. Packard by and through his attorney, James H. Turner, and respectfully represents:

1. That the debtor has filed a Chapter 13 Petition;
2. That the debtor receives regular income from employment with CME Manufacturing, which may be attached under 11 U.S.C. Section 1326 to fund the Chapter 13 Plan;
3. That the likelihood of success in this case will be much greater if the debtor's income is attached to fund the plan;
4. That the debtor, Dale Packard consents to the wage attachment.

WHEREFORE, the debtor respectfully requests that this Court enter an Order directing the above-mentioned employer to pay Trustee in the amount set forth in the attached Order.

Respectfully submitted,

/s/ James H. Turner, Esquire  
James H. Turner  
Turner and O'Connell  
915 N Mountain Road, Suite D  
Harrisburg, PA 17112  
(717) 232-4551  
Attorney for Debtor

**DEBTOR'S CONSENT TO VOLUNTARY WAGE ATTACHMENT**

I, Dale Packard hereby consent to an attachment of my wages for the purpose of funding my Chapter 13 Plan.

Date: 1/8/21

/s/ Dale R. Packard  
Dale R. Packard

**CERTIFICATE OF SERVICE**

I, James H. Turner, Esquire, hereby certify that I have, this date, caused a true and correct copy of the within Motion to Pay Trustee Through Voluntary Wage Attachment to be served upon the person set forth below by depositing same in the United States mail, first class postage prepaid, at Harrisburg, Pennsylvania as follows:

Charles J. DeHart, III, Esquire  
Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Payroll Department  
CME Manufacturing  
4000 Clayton Road  
PO Box 4098  
Maryville, TN 37802

Date: 1/8/21

/s/ James H. Turner, Esquire  
James H. Turner, Esquire

**IN THE UNITED STATES BANKRUPTCY COURT  
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IN RE

DALE R. PACKARD

:

: Case No. 1:20-02533

**ORDER**

Upon consideration of the above-named debtor having filed a petition under Chapter 13 of the Bankruptcy Code and having submitted all future income to the jurisdiction of this Court in accordance with statute,

IT IS THEREFORE ORDERED, that until further Order of this Court, the entity from who the debtor receives income:

Payroll Department  
CME Manufacturing  
4000 Clayton Road  
PO Box 4098  
Maryville, TN 37802

deduct from said debtor's income the sum of \$257.44 from each weekly paycheck, beginning on the next pay day following receipt of this Order and deduct a similar amount each pay period thereafter, including any period from which the debtor receives a periodic or lump sum payment as a result of vacation, termination, or any benefits payable to the above debtor and to remit the deductible sums to:

Charles J. DeHart, III, Esquire  
Chapter 13 Trustee  
PO Box 7005  
Lancaster, PA 17604

IT IS FURTHER ORDERED that the employer from whom the debtor receives income shall notify the Trustee if the debtor's income is terminated and the reason therefor.

IT IS FURTHER ORDERED that all remaining income of the debtor, except the amounts required to be withheld for taxes, social security, insurance, pension or union dues be paid to the debtor in accordance with usual payment procedure.

IT IS FURTHER ORDERED that the employer will place the case number (found at the top of this Order) on all checks being forwarded to the Trustee to ensure proper accounting of the funds.

By the Court